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Wilmington, Delaware 19898

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October 26, 1992

Michael F. Wood, Director
Compliance Division (EN-342)
Office of Compliance Monitoring
U.S. Environmental Protection Agency
401 M. Street, S.W.
Washington, D.C. 20460

Dear Mr. Wood:

8ECAP-0025: Phase 1 Final Report

In accordance with the June 28, 1992 final Registration and Agreement for TSCA, Section 8(e) Compliance Audit Program ("CAP"), Regulatee submits this Phase 1 Final Report for certain information previously submitted to the EPA under the CAP-Phase 1 audit¹.

Please note that Regulatee has claimed certain information contained in prior CAP submissions as Confidential Business Information. CAP submissions containing confidential business information are separately identified in this Phase 1 Final Report as Part 2B. Regulatee restates and incorporates by reference confidentiality assertions and substantiation of confidentiality previously submitted with the corresponding CAP submission.

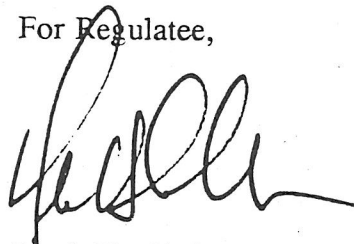
I certify that the TSCA Section 8(e) Compliance Audit (Phase 1) has been completed. I certify that the information contained in or accompanying this Final Report is true, complete and accurate. As to any identified portions

¹This Phase 1 Final Report is submitted in a timely manner, See: January 17, 1992 letter from M.F. Wood (EPA-OCM) to M. Christman (Du Pont) [1st Request for Extension of Termination Date]; August 18, 1992 letter from M.F. Wood (EPA-OCM) to M. Christman (Du Pont) [2nd Request for Extension of Termination Date]. Regulatee has submitted a Phase 1 Interim Report (August 27, 1992).

of this Final Report for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for persons who, under my direct instructions, made the verification that this information is true, accurate and complete.

Submission of information under the CAP (Phase 1) is occasioned by unilateral changes in EPA's standards as to what EPA now considers as reportable information. Regulatee's submission of information is made in response to the new EPA Section 8(e) reporting standards² and is not an admission of TSCA violation or liability; that Regulatee's activities with the identified substances reasonably support a conclusion of substantial health or environmental risk, or that the information itself reasonably supports a conclusion of substantial health or environmental risk.

For Regulatee,



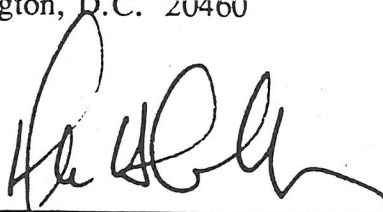
Mark H. Christman
Counsel
(302) 774-6443

² See, U.S. EPA, "TSCA Section 8(e) Reporting Guide" (June 1991) as amended by the April 10, 1992 letter from M. Wood, EPA-OCM to M. Christman (Du Pont); May 22 1991 letter from M. Christman (Du Pont) to D. Williams, EPA-OTS [Request for Concurrence: Models]; November 14, 1991 letter from M. Christman (Du Pont) to D. Williams, EPA-OTS and A. Cherry, EPA-OCM ["Environmental Bioassay Tests"]; December 9, 1991 letter from M. Christman (Du Pont) to D. Williams, EPA-OTS and A. Cherry, EPA-OCM ["Pesticide Screening Data/TSCA 8(e) Reporting"]; December 26, 1991 letter from R. Sussman to V. Kimm, EPA-OPPT ["Health Effect Reporting Under TSCA Section 8(e)"]; February 3, 1992 letter from M. Christman (Du Pont) to C. Auer, EPA-OTS ["Pesticide Screening Data/TSCA 8(e) Reporting"]; March 27, 1992 letter from Allied-Signal Inc. et al to M. Greenwood, EPA-OPPT [re "PAFT"]; April 2, 1992 letter from V. Kimm to R. Sussman, April 14, 1992 ["Health Effect Reporting Under TSCA Section 8(e)"]; letter from M. Greenwood, EPA-OPPT to M. Christman (Du Pont) [re "PAFT"].

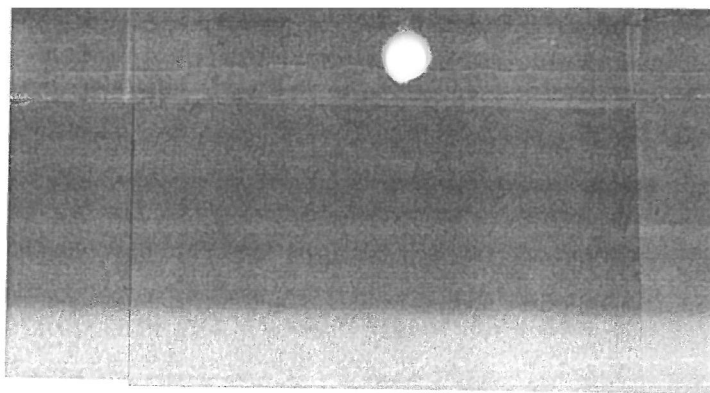
Certificate of Service

I certify that on this 26th date of October, 1992, I served the original CAP Phase 1 Final Report for Regulatee 8E-0025 by placing said report in an envelope, certified mail, return receipt requested to:

Michael F. Wood, Director,
Compliance Division (EN-342)
Office of Compliance Monitoring,
U.S. Environmental Protection Agency
401 M street, S.W.
Washington, D.C. 20460

A handwritten signature in dark ink, appearing to read 'Mark H. Christman', written over a horizontal line.

Mark H. Christman
Legal D-7158
E.I. du Pont de Nemours and Co.
1007 Market Street
Wilmington, DE 19898



8ECAP-0025

CAP PHASE 1 FINAL REPORT

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Part 2: CAP Submissions Index	
2A Nonconfidential Index	1-228
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The attached list excludes all submissions, except excerpts from Part 2A where 20 of the 1,386 TSCA 8(e) submissions were made to EPA by E.I. du DuPont de Nemours and Company as part of their October 26, 1992 TSCA 8(e) CAP Phase 1 Final Report involving *Amonium perfluorooctanoate (APFO)* (CAS No. 3825-26-1).

(197)CAS # 3825-226-1

Chem: Ammonium Perfluorooctanoate

Title: Inhalation Subacute

Date: July 20, 1979

Summary of Effects: Clinical chemistry suggests possible liver dysfunction

(970) CAS# 3825-26-1

Chem: Ammonium Perfluorooctanoate

Title: Acute Inhalation Dust Toxicity

Date: 6/17/69

Summary of Effects: ALC 0.8 mg/L

(1006) CAS # 3825-26-1

Chem: Ammonium perfluorocaprylate

Title: Acute oral test

Date: 11/8/61

Summary of Effects: Liver effects

(1007)CAS # 3825-26-1

Chem: Ammonium perfluorooctane

Title: Acute oral test

Date: 6/13/68

Summary of Effects: Liver effects

(1035) CAS # 3825-26-1; 1868-86-6; 4089-61-6; 80010-35-1

Chem: Octanoic acid, pentadecafluoro-, ammonium salt;

nonanoic acid, 2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9-hexadecafluoro-ammonium salt;

propanoic acid, 2-[2-[-(aminosulfonyl)-1,1,2,2-tetrafluoroethoxy]-1,1,2,3,3,3-hexafluoropropoxy]-2,3,3,3-tetrafluoro-, monoammonium salt; poly(difluoromethylene), alpha-fluoro-omega-[2-(sulfooxy)ethyl]-, ammonium salt

Title: C-8 Alternatives: Maternal and Developmental Toxicity in the Rat (Preliminary Study by Gavage)

Date: 10-2-84

Summary of Effects: Significant increase in the incidence of fetuses with variations

Ref: 8EHQ-0381-0394S

(1044)CAS # 1868-86-6, 3825-26-1, 57-33-0

Chem: Ammonium/Perfluorocaprylate,

hydrohexadecafluoro-nonanoate and ammonium

3,6-dioxo-2,5-di(trifluoromethyl)-undecafluorononanoate

Title: Effect of Fluorocarbon dispersing agents on the livers of rats and dogs

Date: August 19, 1965

Summary of Effects: Liver toxicity

(1045) CAS # 3825-26-1

Chem: Ammonium Perfluorocaprylate

Title: Acute Oral Test

Date: 11-8-61

Summary of Effects: Liver toxicity

(1060) CAS #3825-26-1

Chem: Ammonium Perfluorooctanoate

Title: Acute Oral Test

Date: June 13, 1968

Summary of Effects: Liver Toxicity

(1061) CAS #3825-26-1

Chem: Ammonium Perfluorooctanoate

Title: Acute Inhalation Dust Toxicity

Date: June 17, 1969

Summary of Effects: Liver toxicity

(1062) CAS #3825-26-1

Chem: Octanoic acid, pentadecafluoro-, ammonium salt

Title: Skin Absorption LD50 - Rabbit and Rat

Date: October 26, 1979

Reissued: February 26, 1980

Summary of Effects: Liver toxicity

(1100) CAS #3825-26-1

Chem: Octanoic Acid, Pentadecafluoro-, Ammonium salt

Title: Rat Skin Absorption Subacute Study w/FC-143

Date 10-10-80

Summary of Effects: Liver necrosis with delayed recovery following treatment
with 2,000 mg/kg
see also: 8EHQ-0381-0394S

(1114) CAS # 3825-26-1

Chem: Octanoic Acid, pentadecafluoro-ammonium salt

Title: Subacute Inhalation Toxicity of Pentadecafluoro octanoic acid, ammonium salt

Date 4-15-81

Summary of Effects: Persistence in blood - dose related; liver effects reversible
but took 42 days

(1131) CAS # 3825-26-1

Chem: (1) Octanoic Acid, pentadecafluoro-, ammonium salt

(2) 2,4,6(1H,3H,5H)-Pyrimidine-trione, 5-ethyl-5-phenyl-, monododium salt

(3) Benzeneacetic acid, alpha-phenyl-alpha-propyl-z-(diethylamino)- ethyl ester

Title: Oral LD50 Test in Rats

Date: 9-30-81

Summary of Effects: Tremors

see also 8EHQ-0381-0394S

(1188) CAS # 3825-26-1; 80010-38-4

Chem: (1) Octanoic acid, pentadeca-fluoro-, ammonium salt

(2) Polydifluoromethylene, alpha-fluoro omega (2-sulfoethyl)-
ammonium salt

Title: Mouse Feeding Study - 14 day

Date 10-26-81

Summary of Effects: Tremors and significantly increased liver weights
See also 8EHQ-0391-0394S

(2)

(1190) CAS #3825-26-1

Chem: Octanoic Acid, pentadecafluoro-, ammonium salt
Title: Oral LD50 Test in Guinea Pigs
Date 6-1-81
Summary of Effects: Tremors
See: 8EHQ 0381-03945

(1191) CAS #3825-26-1

Chem: Octanoic Acid, pentadecafluoro-, ammonium salt
Title: Oral LD50 Test in Mice
Date 6-17-81
Summary of Effects: Tremors
See: 8EHQ 0381-03945

(1196) HLR 537-82

CAS #3825-26-1

Chem: Octanoic Acid, pentadecafluoro-, ammonium salt
Title: Fourteen Day Feeding Study in Male and Female Mice
Date 10-1-82
Summary of Effects: Liver toxicity
See: 8EHQ 0381-03945

(1197) CAS #3825-26-1

Chem: Octanoic Acid, pentadecafluoro-, ammonium salt
Title: C-5 Liver weights in rats and mice: oral administration to males and females
Date 5-18-83
Summary of Effects: Liver toxicity
See: 8EHQ 0381-03945

(1198) CAS # (1)3825-26-1 (2)64-17-5

Chem: (1)Octanoic acid, pentadecafluoro-ammonium salt (2)Ethanol
Title: Acute Oral Effects of C8 and Ethanol in the rat
Date 10-8-84
Summary of Effects: Liver toxicity
See: 8EHQ 0381-03945

(1202) CAS 3825-26-1; 57-30-7; 302-33-0

Chem: Octanoic acid, pentadecafluoro-ammonium salt; 2,4,6(1H, 3H, 5H)-pyrimidine trione, 5-ethyl-5 phenyl-monosodium salt; benzeneacetic acid, alpha-phenyl-alpha-propyl-2-(diethylamino)-ethyl ester
Title: Oral LD50 in Rats
Date: 9/30/81
Summary of effects: tremors
See: 8EHQ 0381-03945

(3)